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December 13, 2017

Via ECF

Hon. Steven M. Gold, USMJ
United States District Court
Eastern District of New York
225 Cadman Plaza East, Chambers 1217
Brooklyn, NY 11201

Re: Gaston v Valley National Bancorp, et al., 17-cv-01886 (FB)(SMG)

Your Honor:

This office represents Valley National Bancorp and Valley National Bank (hereinafter collectively “Defendants” or “the Bank”) in the above referenced matter, and submit this correspondence together with Plaintiffs’ Counsel, Outten & Golden and The Shavitz Law Group, to jointly request that the Court stay any determination regarding the proposed Notice in this matter while the parties engage in pre-notice settlement discussions of the federal and state law claims in this action. In support of this goal, the parties are executing a tolling agreement that will commence from today’s date through February 28, 2018. The parties are in the process of preparing a stipulation to stay the case in most respects, toll the statute of limitations for members of the collective, and for the parties to engage in settlement negotiations.

Respectfully submitted,
s/
James M. Lemonedes

JML:td
cc: all counsel via ECF

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